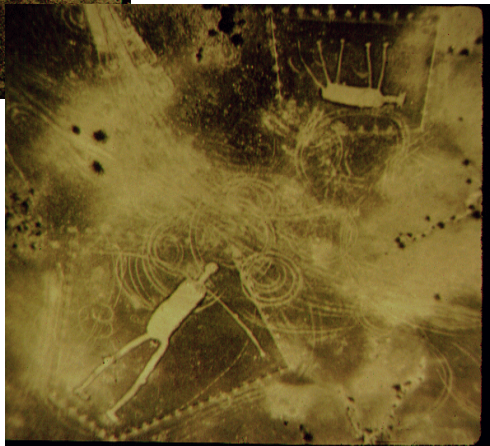


Bureau of Land Management

Strategic Paper on Cultural Resources At Risk



Blythe Intaglios, September 1952
National Geographic photo



Blythe Intaglios, early 1970's

June 2000

BLM Cultural Resources At Risk

Executive Summary

The BLM manages the largest, most diverse and scientifically most important body of cultural resources of any federal land managing agency. However, much of this cultural resource base is seriously threatened. This “Great Outdoor Museum,” which has the potential to document the full sweep of western prehistory and history, will soon lack sufficient integrity and representativeness to relate anything more than minor anecdotes.

Although we have done a good job of complying with Section 106 of the National Historic Preservation Act, we are failing to actively manage the resources entrusted to us. Our Section 106 compliance efforts have resulted primarily in finding cultural properties and avoiding them, or allowing them to be destroyed after mitigation. While this is a form of preservation, it is not the same as long-term management of cultural properties for the full range of values they contain.

Natural and human-caused threats are reducing our opportunities for interpreting sites, for providing long-term access to properties valuable to Native Americans and other ethnic groups, for promoting and facilitating scientific research, and for conserving properties for the future. Increasing visitation to the public lands is resulting in intentional and inadvertent damage through collection, vandalism, surface disturbance, and other depreciative behavior. Increasing land use authorizations for rights-of-way, mining, public facilities and other legitimate and necessary uses of the public lands continue to result in an ever-diminishing cultural resource base. With every year that passes, the diversity of our cultural resources is reduced, and we lose more of our ability to tell the story of the public lands.

A recent Office of Inspector General (OIG) audit identified several critical weaknesses in BLM’s cultural resource management program. The OIG found that we lack a long-range plan to survey areas for the purpose of understanding human behavior and use of the land. The OIG also found BLM deficient in other proactive efforts including stabilizing sites, interpreting sites, and preparing historic contexts, project plans and National Register nominations. Not surprisingly, the OIG found that BLM cultural heritage staff spend 70 to 99 percent of their time on Section 106 compliance work, as opposed to proactive cultural program work.

A major reason for the deficiencies cited by the OIG is the flat staffing level maintained by our cultural program for the past 25 years, especially compared to the National Park Service and U.S. Forest Service which manage less land and fewer cultural resources. The U.S. Forest Service, which has a similar mission, manages 27 percent fewer acres than BLM but employs 28 percent more cultural heritage specialists. NPS manages less than one-third the acreage of BLM but employs more than five times the number of cultural resource personnel. Despite the flat staffing levels, our Section 106 compliance workload continues to increase every year. The national

Programmatic Agreement BLM entered into to streamline its Section 106 work has failed to free up a significant amount of time for proactive work. What little slack resulted from the Programmatic Agreement has been quickly absorbed by increasing compliance work and a host of new legal requirements in other areas such as Native American consultation.

BLM's cultural heritage staff have exhausted all available means to expand the level of proactive work accomplished, including making the Section 106 process more efficient, using term appointments, temporary hires, and volunteers, expanding the number of outside challenge cost share partnerships with state, federal and private entities, contracting with outside entities, and creatively and aggressively pursuing new sources of funding. Without additional staff and funding, our proactive efforts will continue to decline.

Another major reason for the critical weaknesses cited by the OIG is that Section 106 compliance work is being funded improperly with cultural program (subactivity 1050) dollars, while proactive work is being accomplished largely through external funding sources, volunteer labor, and time contributed by BLM employees. The Bureau's lack of adherence to its longstanding policy of coding Section 106 compliance work to the benefitting subactivities has kept the cultural program from using its own budget to actively manage cultural properties.

Several measures are recommended to address the risks to our cultural resources by promoting a more proactive program. These include recognizing and awarding excellent staff and managers, enlisting the aid of a Field Committee member to implement recommendations, working with the WO Budget Office and Budget Strategy Team to ensure that compliance work is funded by the benefitting subactivities, developing an "Opportunities Book" to highlight protection needs for priority cultural resources, expanding the cultural heritage program annual report to highlight successful proactive efforts, developing a training module at National Training Center (NTC) on proactive management, and evaluating Management Information System (MIS) budget data to ensure that 1050 funds are being used appropriately.

What BLM Cultural Resources Are At Risk?

The BLM manages the largest, most diverse and scientifically most important body of cultural resources of any federal land managing agency. These resources, which represent the BLM's "Great Outdoor Museum," span virtually the entire spectrum of human experiences since people first set foot on the North American continent more than 13,000 years ago. This "Great Outdoor Museum" provides a unique opportunity for BLM to document the full sweep of western prehistory and history, and tell the complete story of people on the western lands. No other federal land managing agency can make this claim. However, BLM's ability to relate the complete and unbroken story of western land use and occupancy can only be realized if a representative and relatively pristine body of cultural resources is preserved into the next millennium. At this moment in time, so

much of the cultural resource base is at risk that it will soon lack sufficient integrity and representativeness to relate anything more than anecdotal accounts of western land use.



Figure 2 Petroglyphs in Moonflower Canyon near Moab, UT

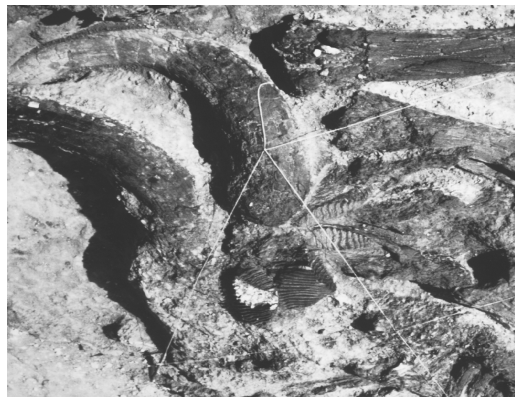


Figure 4 Closeup of mammoth skull at Murray Springs

To date, almost 229,000 archaeological and historical resources have been recorded on the roughly 13.9 million acres of public lands that have been inventoried, which represents roughly 5 percent of all lands administered by the BLM. Projecting these figures to the entire 264 million acres of BLM-administered lands works out to an estimated 4 to 4.5 million potential archaeological and historical properties on the public lands. These sites range from 13,000-year-old mammoth kill sites associated with Paleoindian hunters, to prehistoric complexes of Anasazi pueblos and cliff dwellings, through Spanish and Russian period exploration and settlement sites, to Western frontier forts, Gold Rush era cabins, and more recent historic

sites documenting westward migration, mining, ranching, railroading, and even WWII and Cold War military sites.

Currently, BLM has 255 listings on the National Register of Historic Places, encompassing more than 3,610 contributing properties, 22 National Historic Landmarks, and 5 World Heritage sites. Portions of 8 National Historic Trails covering 3,500 miles cross the public lands, while at least 5,000 additional miles occur along 10 non-designated historic trails. Standing structures, very

conservatively estimated to number 1,500, include prehistoric pueblos, cliff dwellings, antelope and bighorn sheep traps, and agricultural features, as well as historic-period mining structures (such as smelters, mill sites, arrastras, and charcoal kilns), ranch buildings, adobe forts, stage stops, townsites, lighthouses, cabins, a salt tram, and Depression-era schoolhouses.

These resources and others are all at risk to a greater or lesser extent, although objective estimates of the extent of damage and destruction are virtually non-existent. Still, we have indications of alarming trends. We know that close to 100 percent of the “classic” Mimbres sites in southwestern New Mexico have been looted and destroyed. Similarly, in the Four Corners states, where more than 150,000 sites have already been recorded, between 30 and 50 percent of all sites have been looted, while among the larger and more significant sites the percentage of looted sites may be closer to 90 percent. Also, there is evidence that specific site types are no longer represented on the public lands, such as prehistoric fishtraps along ancient Lake Cahuilla in Southern California. Rock art, one of the most visible and visually appealing resources, has often been vandalized with graffiti or attempts have been made to remove panels. Many of the prehistoric pueblos and cliff dwellings in southeastern Utah’s Grand Gulch, where more intact prehistoric plastered buildings occur than in Mesa Verde, are seriously threatened. By no means, however, are threats to archaeological and historical sites confined to looting and vandalism, as recreational activities, urban sprawl, overuse and natural erosion are increasingly taking their toll on our Nation’s irreplaceable treasures.



Figure 5 Stabilization work at the Swansea Railroad depot, a project for which BLM Arizona received an Arizona Heritage Preservation Award in 1999

BLM’s cultural resources have vitally important preservation needs, including project planning, stabilization, monitoring, interpretation and “hardening” for visitor use. In connection with the recent preparation of the BLM’s FY 2001 Budget Justifications, BLM State Offices identified more than \$84 million in needs for management of 82 special areas, including almost \$10 million for cultural resource work; more was requested for cultural resource management than for any other program except recreation. We fully expect that the funding required to deal with the most “at risk” cultural properties will be many times greater than this figure.

Because of the importance attributed to the cultural resources on the public lands by Native Americans or Alaska Native groups with ancestral links to public lands, and by local western communities, other ethnic groups, the public at large, scientists, educators, international visitors, and others, it is critical that these preservation needs begin to be addressed. By failing to address the critical and enormous cultural resource preservation and protection needs, we condemn our Nation’s legacy to the mantelpiece of posterity.

A new poll conducted by Harris Interactive for the Society for American Archaeology, underwritten by Federal agencies, including the BLM, found there is large scale support for laws protecting archaeological resources (96 percent) and use of public monies to preserve archaeological sites (80 percent). The poll found that most people (88 percent) have visited museums exhibiting archaeological materials, while 37 percent have visited an archaeological site.

Clearly, this widespread interest in archaeology will lead to continued impacts to archaeological sites from legitimate and illegitimate uses, particularly as the west becomes more urbanized. Also, the designation of new National Monuments, including those created because of their archaeological values, will make BLM lands better known and further strain BLM's ability to adequately protect its fragile cultural resources. The public interest in archaeological resources of the type that BLM manages in quantities greater than any other agency will require BLM to "harden" and interpret such resources to accommodate public visitation.

In addition to the legal and moral responsibilities we have to protect our cultural legacy, there is a more immediate reason for addressing this need. Recently, the Office of Inspector General (OIG) identified several critical weaknesses in the BLM's cultural resources management program. Among other things, the OIG report criticized the BLM for its failure to prioritize and conduct non-Section 106 cultural resource inventories on public lands deemed to have a high potential for important cultural resources. The failure to undertake such inventories creates a paradoxical situation where BLM may be managing less important known resources at the expense of more important but unknown resources.

Why are BLM's cultural resources at risk?

For the past 25 years, BLM has done a creditable job of complying with Section 106 of the National Historic Preservation Act. Yet, we are losing an important part of America's heritage by failing to actively manage the resources entrusted to us. Our efforts to comply with Section 106 have resulted primarily in finding cultural properties and avoiding them, or allowing them to be destroyed after mitigation. While this is a form of preservation, it is not the same as long-term management of cultural properties for the full range of values they contain. In many ways, Section 106 compliance is the very opposite of management.

Natural and human-caused threats are reducing our opportunities for interpreting sites, for providing long-term access to properties valuable to Native Americans and other ethnic groups, for promoting and facilitating scientific research, and for conserving properties for future study. The lessons we can learn from past cultures have direct relevance on the choices our society is faced with today. With every year that passes, the diversity of our cultural resources is reduced. We are losing our ability to tell the complete story of our Nation's history on the public lands by not fully meeting our responsibilities under the Federal Land Policy and Management Act and Section 110 of the National Historic Preservation Act to proactively manage this fragile legacy. Because of this situation, the American people are losing their connections to the land — their

sense of place—and ultimately their respect for the past and its meaning as an anchor to the present and a guide to the future.

EXTERNAL THREATS

Uncontrolled use. Uncontrolled use is the most immediate and pervasive threat to cultural resources on BLM lands. But one of the most enjoyable aspects of visiting BLM lands, compared to other federal lands, is the freedom experienced by visitors because of the lack of restrictions that are placed on them. The public lands are fast becoming more accessible, better known, and more intensively used. In many areas, urban sprawl, encroaching on previously remote areas, is turning the public lands into recreational backyards. The explosion in the use of mountain bikes and ATVs, and even the designation of backcountry byways, has dramatically increased visitation to lands that were previously used only by small numbers of hikers. This increased visitation inevitably results in intentional and inadvertent damage through collection, vandalism, surface disturbance, and other depreciative behavior.

Authorized use. Along with increasing recreational use, we are seeing an increase in land use authorizations for rights-of-way, mining, public facilities, and other legitimate and necessary uses of the public lands. These uses will continue to result in an ever-diminishing cultural resource base, even when data recovery or other forms of mitigation are employed. Natural weathering and erosion, as always, play their part in this attrition.

Agency funding. The Bureau's budget has been flat over the last decade and has seen its workforce decline over this time period even though its workload has become more complex. This decline in budget and staff comes at a time when more and more Westerners recognize the crucial role that BLM lands play in maintaining the appeal and lifestyle of the fast-growing West. More than ever, the public is turning to BLM-managed land as the final frontier for wide open space, as an outdoor recreational playground that offers clean air and clean water, and as a sanctuary for solitude. A key reason for this growing appreciation, besides the inherent appeal of the lands themselves, is that BLM lands are in the public's backyard. Nearly two-thirds of the BLM lands located in the continental United States are within an hour's drive of urban areas. Yet, in spite of the accessibility of BLM lands and the fact that BLM manages more land—264 million acres—than any other Federal land-management agency, it manages this land on a fraction of the operating budget in contrast to the U.S. Forest Service and the National Park Service. BLM's operating budget amounts to funding at \$2.82 an acre, as compared to \$6.65 an acre for the Forest Service and \$16.85 an acre for the National Park Service!

INTERNAL THREATS

Critical weaknesses. As previously mentioned, the OIG's FY1999 audit of BLM's cultural heritage program cited several critical weaknesses. The OIG found that we lack a long-range plan to survey areas for the purpose of understanding human behavior and use of the land. Nearly all survey accomplished by BLM is done for purposes of Section 106 compliance. As

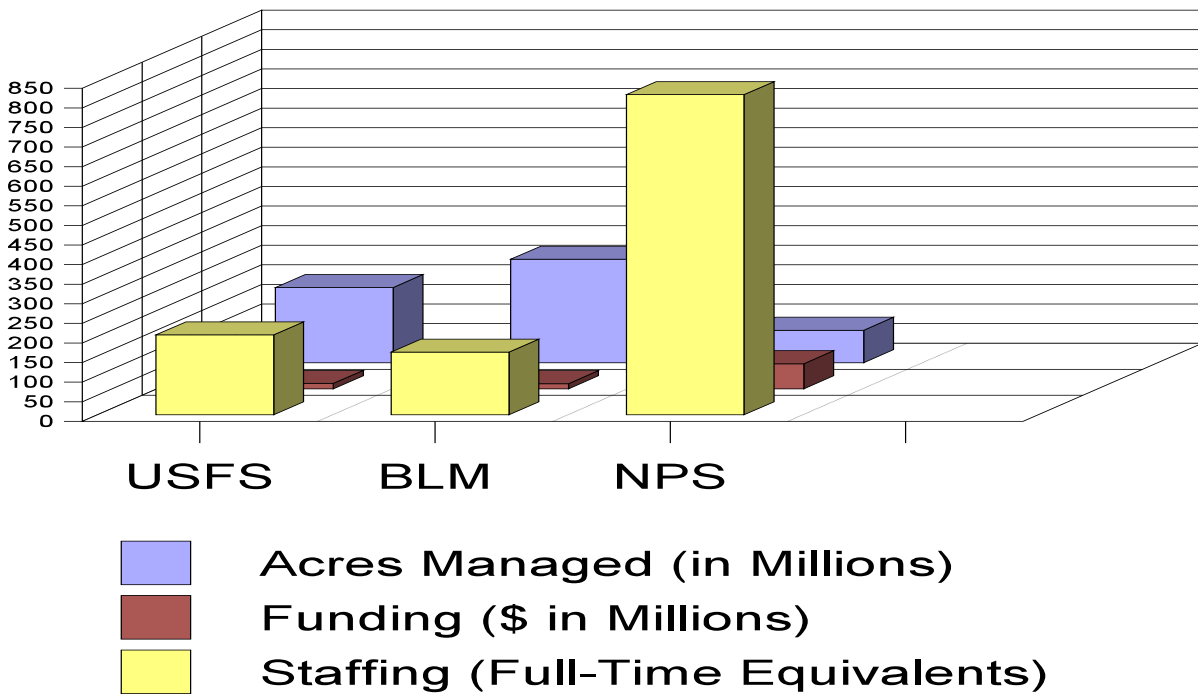
such, it is haphazard in that the locations surveyed correspond exclusively to proposed land uses; they are not chosen using criteria that will help us gain representative samples from which we can derive scientifically based conclusions about the past. Annually, the amount of acreage inventoried in response to proposed land uses amounts to almost 500,000 acres, while that surveyed to gain an understanding of human uses of the land equals less than 5,000 acres.

The OIG also found that we are deficient in completing other proactive actions to effectively manage our cultural resources. Such actions include stabilizing sites, interpreting sites, and preparing historic contexts, project plans, and National Register nominations. The lack of historic contexts, in particular, hampers our ability to determine which cultural resources are, and which are not, important

Not surprisingly, the OIG found that BLM cultural heritage staff spend 70 to 99 percent of their time on Section 106 compliance work, as opposed to proactive cultural program work.

Staffing levels. The OIG's conclusions are consistent with the flat staffing level maintained by the cultural program over the past 25 years, as shown in the following graph. The U.S. Forest Service, with a mission similar to BLM's, manages 27 percent fewer acres but employs 28 percent more cultural heritage specialists. The NPS manages less than one-third the acreage of BLM yet has more than five times the number of cultural heritage personnel.

Fig. 1. Budget Data for Similar Agencies



Excludes the National Park Service's Cultural Resources Applied Research, National Register, and Center for Applied Technology and Training Programs, as well as grants issued pursuant to the United States Code (25 U.S.C. 3001).

BLM is the largest federal land managing agency, yet has the fewest number of cultural heritage specialists. BLM reached its full staffing capability of 135 full-time professional cultural heritage staff in 1976. In the intervening 24 years, the number of full-time cultural heritage staff has not substantially increased, and in some States has decreased.

Despite the flat staffing levels, our Section 106 compliance workload continues on an upward trajectory with no end in sight. To streamline the Section 106 process, and expand opportunities to proactively manage our cultural resources, BLM entered into a national Programmatic Agreement with the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers in 1997. However, the goal of creating a better balance between compliance work and cultural program work has gone largely unfulfilled to date. What little slack resulted from the Programmatic Agreement has been quickly absorbed by both increasing compliance work and attention to a host of new legal requirements besides proactive responsibilities.

In the past few years, BLM has strongly increased its efforts to consult with Indian tribes and develop better working relationships with them. Indian trust issues have generated a critically important new workload as BLM has become more aware of its fiduciary responsibilities toward tribes. The Native American Graves Protection and Repatriation Act (NAGPRA) has generated a massive effort to identify Bureau museum collections in repositories throughout the country and consult with Indian tribes and Alaska Native groups on the treatment and disposition of human burial remains. At the same time, new regulations have mandated a much stronger role for BLM in assessing the condition of its museum property and the capabilities of repositories to curate it. Paleontology, a distinct profession in itself, is now a collateral duty for most cultural heritage specialists, adding to workloads associated with strategic planning, budget redesign, and other new demands on staff time.

Cultural heritage staff have exhausted all available means to expand the level of proactive cultural heritage program work accomplished. These efforts include streamlining the Section 106 process, using term appointments, temporary hires, and volunteers, expanding the number of outside challenge cost share partnerships with state, federal and private entities, contracting with outside entities, and creatively and aggressively pursuing new sources of funding, where available. Without an influx of additional people and funding, our proactive efforts will continue to decline.

As the following table indicates, in terms of challenge cost share and cooperative management agreements, the number peaked at 126 agreements in FY 1992 and steadily dropped to 75 in FY 1998, the lowest number since FY 1990; in FY 1999 the number of cooperative agreements jumped to 95, still well below the peak level.

**Summary of Challenge Cost Share/
Cooperative Management Agreements
(1989-1998)**

FISCAL YEAR	# of PROJECTS	COOPERATOR INPUT	BLM INPUT	COOP:BLM RATIO
FY1989	62	876,623	243,437	3.6:1
FY1990	71	1,484,333	299,440	5:1
FY1991	106	2,849,815	714,190	4:1
FY1992	126	3,221,120	722,072	4.5:1
FY1993	119	2,845,573	786,483	3.6:1
FY1994	120	2,400,000	933,000	2.5:1
FY1995	93	2,256,355	543,979	4.1:1
FY1996	83	2,487,271	458,060	5.4:1
FY1997	83	2,546,869	908,130	2.8:1
FY1998	75	2,170,881	717,520	3:1
FY1999	95	2,045,955	890,230	2.3:1

Similarly, in terms of the number of volunteer hours contributed to the BLM for the benefit of the cultural heritage program, the number peaked in FY 1992 and has gradually been declining since then.

**Summary of Volunteer Statistics
in the CRM Program
(1986-1998)**

FY	VOLUNTEER HOURS	HOSTED WORKER HOURS	TOTAL CRM HOURS	ESTIMATED VALUE	TOTAL BLM HOURS	PERCENT AGE OF PROGRAM
FY1986	31,790*	N.A.	31,790	272,704	397,373	8.00
FY1987	51,525*	N.A.	51,525	494,124	515,258	10.00
FY1988	81,669*	N.A.	81,669	780,756	583,351	14.00
FY1989	84,772*	N.A.	84,772	841,490	771,087	11.00
FY1990	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.
FY1991	132,685*	N.A.	132,685	1,649,690	918,460	14.44
FY1992	175,546*	N.A.	175,546	2,404,131	1,060,184	16.56
FY1993	153,966*	N.A.	153,966	1,883,729	1,237,263	12.44
FY1994	135,823*	N.A.	135,823	1,788,682	1,333,359	10.19
FY1995	123,069*	N.A.	123,069	1,372,219	1,219,490	10.09

FY1996	83,500	5,999	89,499	1,008,654	1,097,115	8.16
FY1997	146,016	7,499	153,515	1,926,613	1,149,294	13.36
FY1998	111,446	7,390	118,836	1,699,355	1,345,882	8.83

* includes Hosted Worker Hours

Cultural program funding

The table and graph below show the appropriated level of funding for the cultural heritage program (variously, subactivity 4331 or 1050) from FY 1982 through FY2000, adjusted for inflation to 1982 dollars. While the program has experienced a gradual increase in funding over this 19-year period, there have been two periods where the “real” dollars, adjusted for inflation, have actually decreased, from FY 1987 through FY 1990 and again from FY 1994 through FY 1996. Looking at the time period from FY 1982 through FY 1999 (inflation figures are not yet available for FY 2000), while appropriated dollars increased by 285 percent, the “real” increase actually amounted to only 163 percent.

FY	Budget (000)	FY Budget Adjusted to FY82 Dollars (000)
FY82	\$ 4.510	\$ 4.510
FY83	4.566	4.299
FY84	4.843	4.419
FY85	5.279	4.618
FY86	5.783	4.883
FY87	6.618	5.484
FY88	6.629	5.302
FY89	6.614	5.082
FY90	6.801	4.986
FY91	8.906	6.195
FY92	9.689	6.468
FY93	10.704	6.938
FY94	11.801	7.426
FY95	11.959	7.334
FY96	11.000	6.582
FY97	12.059	7.005
FY98	12.722	7.267
FY99	12.898	7.367
FY00	13.440	N.A.

Source: <http://www.westegg.com/inflation/>

Competing for additional program funding. BLM's ability to compete for additional cultural resource funds outside the normal budget process is hindered by a bias against funding historic preservation work for the type of cultural resources which BLM predominantly manages, namely, prehistoric resources. This is clearly reflected in Congressional direction and funding for the Millennium Grants to Save America's Treasures program, the First Lady's initiative to protect America's vanishing cultural legacy. In FY 1999, grant proposals required a dollar-for-dollar match by non-federal partners, and a minimum of \$50,000 in matching grant monies. Sixty-two grants were awarded at a total cost of \$30 million. Only 2 of the projects related to prehistoric resources, neither of which called for archaeological work or involved BLM archaeological resources.

Again, in FY 2000, Congress appropriated money for Save America's Treasures grants. This year they have earmarked half of the \$30 million appropriation for standing historic structures in urban settings (vs. rural settings, where most BLM resources are situated). While the remaining money is available for agencies receiving their funding through the Interior and Related Agencies Appropriation Act to compete for, the amount that must be matched by non-Federal partners has been raised to \$250,000. This effectively precludes BLM from competing for the sort of on-the-ground historic preservation projects for which BLM desperately requires funding. Typically, BLM cooperative projects are small scale efforts. Also, by comparison with agencies such as the National Park Service and the Fish & Wildlife Service, BLM does not have an agency foundation that can help with partner fund-raising.

Misuse of cultural program funds. In most States, compliance work is being funded improperly with cultural program dollars, while proactive cultural program work is being accomplished largely through external funding sources, volunteer labor, and time contributed by BLM

employees. The Bureau's lack of adherence to its longstanding policy of coding Section 106 compliance work to the benefitting subactivity has kept the cultural program from using its own budget to actively manage the properties we administer. Very preliminary data from the Bureau's newly-instituted Management Information System (MIS) indicates that through slightly more than half of the current fiscal year in excess of \$415,000 of 1050 money has been spent inappropriately supporting benefitting subactivities; this represents more than 60% of the 1050 budget spent as of April 28, 2000! As long as the cultural program continues to subsidize the cost of compliance work for other programs, it will be unable to move forward with its own program or respond to the weaknesses identified by the Office of Inspector General audit.

How Do We Address The Risk?

There is no "silver bullet" that will magically alleviate the various financial, administrative, staffing, and systemic reasons that place the BLM's cultural resources at risk. Many of these problems have been with us since the inception of the BLM's cultural heritage program, while others have been exacerbated in recent years.

In the long-run, it is imperative that we begin to increase the level of personnel working in the cultural heritage programs. What the "ideal" staffing level should be is unclear. As the OIG report acknowledges, "the Bureau of Land Management has significantly more acreage to oversee, fewer resources. . . , both staffing and funding, to accomplish the Cultural Resource Management mission" than the U.S. Forest Service or National Park Service. On top of that, BLM cultural resource personnel are responsible not only for all the section 106 compliance and proactive activities, but are also normally given lead responsibility for NAGPRA compliance, collections management, paleontology, and Native American consultation and coordination over a wide range of Bureau programs and issues (including Archaeological Resource Protection Act investigations). Clearly, the issue of scarce skills within the cultural heritage program must also be addressed. By doing so, the BLM also has an opportunity to increase the diversity in its workforce.

In the short-term, we think that it is possible to incrementally ameliorate the situation by beginning a serious discussion of the most critical issues affecting the BLM's cultural heritage program and by implementing modest steps to foster a comprehensive proactive program. Such a proactive program would be one where the majority of our work is not driven in reaction to the demands of other BLM subactivities, but rather where cultural resources would be managed for their many benefits to today's and tomorrow's publics, including for their scientific and educational values.

What is our comprehensive proactive cultural program?

A comprehensive proactive program would encompass and expand upon many of the elements of the outreach program BLM had in place in the early 1990's, when its *Adventures in the Past* initiative was at its zenith. This initiative was developed partially in response to one of the 1988 amendments to the Archaeological Resources Protection Act (ARPA) requiring federal land managers to establish a public outreach program explaining the value and importance of archaeological resources. Under our *Adventures* initiative, which served as the BLM's "umbrella" public outreach program, the BLM hosted a series of regional, commemorative and thematic events. These events served to make the public aware of our Nation's legacy and its value, to increase opportunities for the public to enjoy the resources, and to enlist the public in safeguarding them. The early 1990's also corresponded with the period in which BLM developed the Strategic Plan for its Heritage Education Program and established its Heritage Education Team at the Anasazi Heritage Center in Dolores, Colorado.

An updated version of *Adventures* would now also entail more on-the-ground stabilization and restoration work to stem the physical deterioration that many of our archaeological and historical resources are experiencing. Additionally, a comprehensive proactive program would encompass more on-the-ground inventory and interpretation, an expansion of our Heritage Education Program and more off-site education and interpretation, as well as expanded fund-raising and partnership development.

The components for establishing a comprehensive cultural program are already laid out within our BLM manual. This means that we already know what we need to do and how we should do it. Our present manual guidance, based on legal mandates, provides direction for a wide range of (non-Section 106-driven) activities, including physical protection of sites through enforcement and monitoring, managing sites for scientific research and public use, and performing proactive outreach educational efforts as envisioned in our Heritage Education Program Plan. Instituting such a proactive program would finally enable BLM to fulfill its mandates under other laws and requirements for the management of cultural resources, including those specified in Section 110 of the NHPA, ARPA, and FLPMA.

What are examples of successful proactive efforts?

In some cases, we have been able to achieve remarkable successes under mandates other than Section 106. One was at the historic mining town of Swansea in Arizona. There a Field Office was able to marshal a variety of partners and funding sources to stabilize a significant property for future enjoyment and education of the public. Although the success was remarkable, this project was done primarily with volunteers, contributed time, and funding from non-BLM sources. The unfortunate fact is that projects like Swansea are being accomplished in spite of BLM's lack of support rather than with the support that a proactive program would provide. If the Bureau had a comprehensive proactive program in place, more than the last-remaining 20 percent of the site could have been salvaged for public benefit.

Similarly, the BLM has achieved great success with its Heritage Education Program. In the early 1990's, the Director chartered the development of a far-reaching, "flagship" archaeology education program to help educate America's youth about the value of our Nation's heritage and the need to protect it. Through that effort, most states now have (or are developing) Project Archaeology programs (i.e., State Student Handbooks documenting a state's culture history, teacher workshops and newsletters). The Heritage Education Program has achieved other notable successes with the creation of videos and brochures, as well as special educational inserts in "Science and Children," the National Science Teachers Association magazine for elementary school teachers, that reaches hundreds of thousands of teachers and students nationwide. This has been accomplished in spite of the fact that the full complement of 10 heritage educators needed to implement the 11 components of the Director's Heritage Education Strategic Plan have never been fully mobilized; full-time heritage educator positions have never exceeded four.

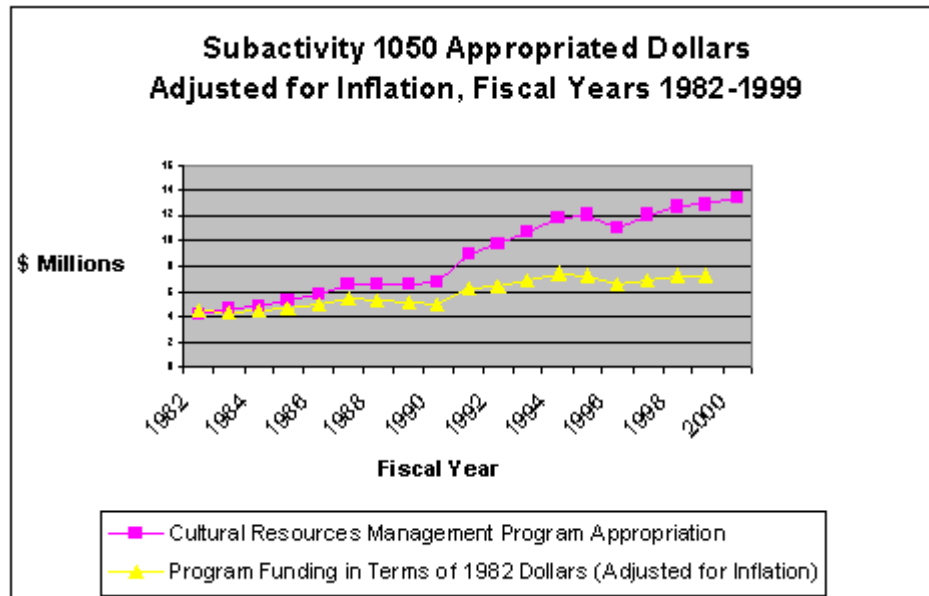
Still another success has been in one of our largest, most remote archaeological properties, the 266,000-acre Tangle Lakes Archaeological District in central Alaska, a National Register of Historic Places property. Through cultural resource inventories started in the 1970's, we have been able to identify over 500 sites, making it the richest concentration of archaeological sites known in the sub-Arctic, with some sites over 10,000 years old. Even greater success could have been achieved had the District had a full-time archaeologist during the past 14 years, rather than during only 8 of these years. Now, with the increasing pace of recreational use, little more than keeping up with the rising Section 106-related workload is possible. Over 75 percent of the District still needs survey work, and site damage is rising.

What Specific Measures are Recommended?

1. Encourage excellence within the cultural resource management program through recognition and awards for outstanding cultural staff and managers. Issue Instruction Memorandum soliciting nominees. (WO-240; July 2000)
2. Enlist a "champion" (Rich Whitley, ASD, NM) from among the ranks of upper level management to facilitate implementation of the recommendations outlined in this strategic paper, including working through this individual to enlist Field Committee, ELT, and WO support for additional personnel in the cultural heritage program. (WO-240; June 2000)
3. Continue to work with the WO Budget Office and the Budget Strategy Team to ensure compliance with the Bureau's long-standing policy of coding section 106 work to benefitting subactivities so that cultural dollars can be appropriately allocated for proactive cultural heritage program work. (WO-240; on-going)
4. Solicit State recommendations for priority "at risk" cultural resources requiring immediate protection and treatment, and highlight these resources in an "Opportunities Book" showing how potential "new" money would be used to treat these properties (WO-

240; July 2000)

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nual report to provide additional State program statistics and to highlight successful proactive efforts. (WO-240; August 2000)

6. Develop a training module at NTC for cultural resource specialists on implementing a proactive cultural heritage program. Also, evaluate the need for a cultural training coordinator at NTC. (Preservation Board; July 2000)
7. Evaluate budget data in MIS to determine if State1050 allocations are being utilized appropriately. (WO-240; on-going)
8. Solicit Field Office recommendations and suggestions on ways of achieving a better balance between proactive CRM efforts and Section 106 compliance. (WO-240; July 2000)

How Should this Strategic Paper Be Used?

This Strategic Paper was developed to draw attention to the fact that BLM's cultural properties are increasingly at risk, to highlight some reasons why this is so, and to begin to focus management attention on the problem. This report also spotlights a few of the successes that have been achieved in the program over the years, and underscores the fact that Field Offices generally understand what constitutes a fully functioning proactive cultural heritage management program because collectively they've had most of the components in place for years.

Specifically, this report can be used to: (1) respond to the critical weaknesses identified in the

OIG; (2) realign the Bureau's proactive cultural resource management program to reflect the Secretary's emphasis on a National System of Conservation Lands; (3) document the impact on the Bureau's cultural heritage program of having cultural funds diverted to support benefitting subactivities; (4) justify additional program needs for implementation of ARPA; and (5) inform outside constituents of BLM's commitment to proactive work and our willingness to work with them in cost-share arrangements.

While the findings and recommendations in this Strategic Paper are primarily targeted towards an internal BLM audience (WO managers, WO Budget Office, BLM Field Office managers, Budget Strategy Team, cultural resource specialists), they are equally valuable for outside entities, such as constituent organizations, State Historic Preservation Officers, the Advisory Council on Historic Preservation, partners, cooperators, and such. Ideally, the findings in this report would be used to bolster our case, both internally and externally, for why BLM requires additional personnel and funding to protect its increasingly threatened cultural resources.